

DRAFT Social Media Policy

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1. Principles

1.1 We, the Councillors and staff of Randwick City Council are committed to upholding and promoting the following principles of social media engagement:

- a. **Openness**
Our social media platforms are places where anyone can share and discuss issues that are relevant to our Council and the community we represent and serve.
- b. **Relevance**
We will ensure our social media platforms are kept up to date with informative content about our Council and community.
- c. **Accuracy**
The content we upload onto our social media platforms and any other social media platform will be a source of truth for our Council and community and we will prioritise the need to correct inaccuracies when they occur.
- d. **Respect**
Our social media platforms are safe spaces. We will uphold and promote the behavioural standards contained in this policy and our Council's Code of Conduct when using our social media platforms and any other social media platform.

2. Council social media platforms

2.1. Platforms

- 2.1.1 Council will maintain a presence on social media platforms that are most relevant to our community which may include:
- a. Facebook
 - b. Instagram
 - c. Youtube
 - d. LinkedIn
 - e. X

2.2. Establishment of Council social media platforms

- 2.2.1 Council's social media platforms must specify or provide a clearly accessible link to the 'House Rules' for engaging on the platform.
- 2.2.2 A new council social media profile, or a social media platform can only be established or deleted with the approval of the General Manager or their delegate or by Council resolution.

NOTE: Where new channels are created or deleted in accordance with 2.2.2, the above list (2.1.1) may be amended without the need for the policy to be endorsed by Council.

2.3. Appointment and role of the social media coordinator

- 2.3.1 Council's Manager Communications will act as the social media coordinator (SMC) and is responsible for overseeing the implementation of this policy and Council's social media presence.
- 2.3.2 The General Manager may change or appoint more than one SMC.
- 2.3.3 The SMC's role is to:
- a) approve and revoke a staff member's status as an authorised user
 - b) develop and/or approve the training and/or induction to be provided to authorised users
 - c) maintain a register of authorised users
 - d) maintain effective oversight of authorised users
 - e) moderate the Council's social media platforms in accordance with Part 5 of this policy
 - f) ensure the Council complies with its record keeping obligations under the *State Records Act 1998* in relation to social media (see clauses 7.1 to 7.2 of this policy)

- g) ensure the Council adheres to the rules of the social media platform(s)
 - h) ensure the Council's social media platforms are set up and maintained in a way that maximises user friendliness and any technical problems are resolved promptly
- 2.3.4 The SMC may delegate their functions under paragraph (e) of clause 2.4.5 to authorised users.
- 2.3.5 The SMC is an authorised user for the purposes of this policy.

2.4. Authorised users

- 2.4.1 Authorised users are members of council staff who are authorised by the SMC to upload content and engage on social media on the Council's behalf.
- 2.4.2 Authorised users should be members of council staff that are responsible for managing, or have expertise in, the events, initiatives, programs or policies that are the subject of the social media content.
- 2.4.3 The SMC will appoint authorised users when required.
- 2.4.4 An authorised user must receive a copy of this policy and induction training on social media use and Council's obligations before uploading content on Council's behalf.
- 2.4.5 The role of an authorised user is to:
- a) ensure, to the best of their ability, that the content they upload onto social media platforms is accurate
 - b) correct inaccuracies in Council generated content
 - c) engage in discussions and answer questions on Council's behalf on social media platforms
 - d) keep the Council's social media platforms up to date
 - e) moderate the Council's social media platforms in accordance with Part 5 of this policy
 - f) ensure the Council complies with its record keeping obligations under the *State Records Act 1998* in relation to social media.
- 2.4.6 When an authorised user engages on Council's social media platforms, it must be clear that they are representing the Council. This can be achieved by using a Council approved profile when posting or engaging.
- 2.4.7 Authorised users must not use Council's social media platforms for personal reasons.

2.5. Administrative tone

- 2.5.1 Authorised users upload content and engage on social media on the Council's behalf. Authorised users must use language consistent with that function and avoid expressing or appearing to express their personal views when undertaking their role.
- 2.5.2 Authorised users may use more personal, informal language when engaging on Council's social media platforms, for example when replying to comments.

2.6. Register of authorised users

- 2.6.1 The SMC will maintain a register of authorised users. This register is to be reviewed periodically to ensure it is fit-for-purpose.

2.7. Ceasing to be an authorised user

- 2.7.1 The SMC may revoke a staff member's status as an authorised user, if:
- a) the staff member makes such a request and it is supported by their manager
 - b) the staff member has not uploaded content onto any of the Council's social media platforms in the previous 12 month period
 - c) the staff member has failed to comply with this policy
 - d) the SMC is of the reasonable opinion that the staff member is no longer suitable to be an authorised user.

3. Councillor social media platforms

- 3.1 For the purposes of this policy, Councillor social media platforms are not Council social media platforms. Part 2 of this policy does not apply to Councillors' social media platforms.
- 3.2 Councillors are responsible for the administration and moderation of their own social media platforms (in accordance with Parts 3, 4 and 5 of this policy), and ensuring they comply with the record keeping obligations under the *State Records Act 1998* (see clauses 7.1 to 7.2 of this policy) and Council's Records Management Policy in relation to social media.
- 3.3 Clause 3.2 also applies to Councillors in circumstances where another person administers, moderates, or uploads content onto the Councillor's social media platform.
- 3.4 Councillors must comply with the rules of the platform when engaging on social media.

3.1. Induction and training

- 3.1.1 Councillors who engage, or intend to engage, on social media must receive induction training on social media use. Induction training can be undertaken either as part of the Councillor's induction program or as part of their ongoing professional development program.

3.2. Identifying as a Councillor

- 3.2.1 Councillors must identify themselves clearly on their public social media platforms as a Councillor. It is suggested the following format be used: *Councillor "First Name and Last Name"*. Councillors may also refer to their Ward, any relevant council positions and political party.

- 3.2.2 A Councillor's social media platform must include a profile photo which is a clearly identifiable image of the Councillor.
- 3.2.3 If a Councillor becomes or ceases to be the Mayor, Deputy Mayor, or the holder of another position (for example, chairperson of a committee), this must be clearly stated on the Councillor's social media platforms and updated as soon as practical when there is a change in circumstances.

3.3. Other requirements for Councillor social media platforms

- 3.3.1 Councillor social media platforms should specify or provide a clearly accessible link to the 'House Rules' for engaging on the platform. Councillors may choose to use Council's house rules and link to the relevant page on Council's website.
- 3.3.2 A Councillor's social media platform must include or provide a clearly accessible link to a disclaimer to the following effect: *"The views expressed and comments made on this social media platform are my own and not that of the Council."*
- 3.3.3 Despite clause 3.3.2, Mayoral or Councillor media releases and other content that has been authorised according to the Council's media and communications protocols may be uploaded onto a Councillor's social media platform.
- 3.3.4 Councillors may upload publicly available Council information onto their social media platforms.
- 3.3.5 Councillors may use more personal, informal language when engaging on their social media platforms.
- 3.3.6 Councillors must uphold and accurately represent the policies and decisions of the Council's governing body but may explain why they voted on a matter in the way that they did. (see section 232(1)(f) of the *Local Government Act 1993*).

3.4. Councillor queries relating to social media platforms

- 3.4.1 Questions from Councillors relating to their obligations under this policy, technical queries relating to the operation of their social media platforms, or managing records on social media may be directed to the SMC in the first instance.

3.5. Other social media platforms administered by Councillors

- 3.5.1 A Councillor must advise the General Manager/SMC of any social media platforms they administer on which content relating to the Council or Council officials is, or is expected to be, uploaded. The Councillor must do so within:
- a) One month of becoming a Councillor, or
 - b) One month of becoming the administrator of the social media account, or
 - c) One month of this policy coming into effect.

4. Standards of conduct on social media

- 4.1 Section 4 of this policy applies to Council officials' use of social media in an official capacity or in connection with their role as a Council official. The policy does not apply to personal use of social media that is not connected with a person's role as a Council official.
- 4.2 Council officials must comply with the Council's Code of Conduct when using social media in an official capacity or in connection with their role as a Council official.
- 4.3 Council officials must not use social media to post or share comments, photos, videos, electronic recordings or other information that:
- a) is potentially defamatory, offensive, humiliating, threatening or intimidating to other Council officials or members of the public
 - b) is an attack on Council officials or third parties
 - c) contains profane language or is sexual in nature
 - d) constitutes harassment and/or bullying within the meaning of the *Model Code of Conduct for Local Councils in NSW*, or is unlawfully discriminatory
 - e) is contrary to their duties under the *Work Health and Safety Act 2011* and their responsibilities under any policies or procedures adopted by the Council to ensure workplace health and safety
 - f) contains content about the Council, council officials or members of the public that is misleading or deceptive
 - g) divulges confidential Council information
 - h) breaches the privacy of other Council officials or members of the public
 - i) contains allegations of suspected breaches of the Council's Code of Conduct or information about the consideration of a matter under the *Procedures for the Administration of the Model Code of Conduct for Local Councils in NSW*
 - j) could be perceived to be an official comment on behalf of the Council where they have not been authorised to make such comment
 - k) commits the Council to any action contrary to within the authorised user's delegation or responsibilities
 - l) violates an order made by a court
 - m) breaches copyright
 - n) advertises, endorses or solicits commercial products or business
 - o) constitutes spam
 - p) is in breach of the rules of the social media platform.
- 4.4 Council officials must:

- a) attribute work to the original author, creator or source when uploading or linking to content produced by a third party where possible
 - b) ensure, as far as practicable, any images of people published on our social media channels have implied, written or verbal consent from the individual and/or parent/guardian
 - c) remove any images from our social media and corporate records should there be a request from an individual/parent/guardian
- 4.5 Council officials must exercise caution when sharing, liking, retweeting content as this can be regarded as an endorsement and/or publication of the content and profile.
- 4.6 Council officials must not incite or encourage other persons to act in a way that is contrary to the requirements of this Part.

5. Moderation of social media platforms

Note: Councils and Council officials should be aware that they may be considered a ‘publisher’ of any content uploaded onto a social media platform they administer, including content that:

- a) is uploaded/contributed/commented on by a third party; and/or**
- b) appears on their social media platform because they have ‘liked’, ‘shared’, or ‘retweeted’ the content, or similar.**

Council officials who are responsible for the moderation of the Council or Councillors social media platforms may remove content and ban a third party from those platforms. Such actions must be undertaken in accordance with Part 5.

For the purposes of Part 5, ‘social media platform’ and ‘platform’ means social media platforms of both Council and Councillors.

5.1. House rules

- 5.1.1 Social media platforms must state or provide an accessible link to the ‘House Rules’ for engaging on the platform.
- 5.1.2 At a minimum, the house rules should specify:
- a) the principles of social media engagement referred to in clause 1.1 of this policy
 - b) the type of behaviour or content that will result in that content being removed or ‘hidden’, or a third party being banned from the platform
 - c) the process by which a third party can be banned from the platform and rights of review
 - d) when the platform will be monitored (for example weekdays 9am – 5pm, during the Council’s business hours)

- e) that the social media platform is not to be used for making complaints (as defined by Council's Complaints Management Policy and Procedure) about the Council or Council officials and provide information or a link to Council's complaints handling policy.

5.1.3 For the purposes of clause 5.1.2(b), third parties engaging on social media platforms must not post or share comments, photos, videos, electronic recordings or other information that:

- a) is potentially defamatory, offensive, humiliating, threatening or intimidating to Council officials or members of the public
- b) is an attack on Council officials or third parties
- c) contains profane language or is sexual in nature
- d) aims to incite hatred based upon religion, culture, gender, sexuality, ability or ethnicity
- e) causes division within our community
- f) constitutes harassment and/or bullying within the meaning of the *Model Code of Conduct for Local Councils in NSW*, or is unlawfully discriminatory
- g) contains content about the Council, Council officials or members of the public that is misleading or deceptive
- h) breaches the privacy of Council officials or members of the public
- i) contains allegations of suspected breaches of the Council's Code of Conduct or information about the consideration of a matter under the *Procedures for the Administration of the Model Code of Conduct for Local Councils in NSW*,
- j) violates an order made by a court
- k) breaches copyright
- l) constitutes spam (including unauthorised promotion of commercial products or businesses)
- m) seeks to deliberately monopolise or influence the social media channel for their own personal purposes
- n) is in breach of the rules of the social media platform.

5.2. Removal or 'hiding' of content

5.2.1 Where a third party uploads content onto a Council social media platform that, in the reasonable opinion of the authorised user, is of a kind specified under clause 5.1.3, the authorised user may remove or 'hide' that content.

- 5.2.2 Whether to hide or remove content will be a decision by the authorised user giving consideration to each individual circumstance. Generally content uploaded that breaches clause 5.1.3 should be removed unless such content is relatively minor or removal of such content in the opinion of the authorised user may unnecessarily inflame a situation or invite further negative comments. If in doubt, check with the SMC.
- 5.2.3 Prior to removing or 'hiding' the content, the authorised user must make a record of it (for example, a screenshot and then save that screenshot on Council's corporate record keeping system).

5.3. Banning users

- 5.3.1 If a third party uploads content that is removed or 'hidden' under clause 5.2.1 of this policy, that third party may be blocked or banned from the social media platform/all platforms.
- 5.3.2 A third party may only be banned from a Council social media platform with the approval of the SMC. This clause does not apply to banning a third party from a Councillor's social media platform.
- 5.3.3 Prior to banning a third party from a social media platform, the party must, where practicable, be advised of the intention to ban them from the platform/all platforms and be given a chance to respond. Any submission made by the third party must be considered prior to a determination being made to ban them.
- 5.3.4 Despite clauses 5.3.1 to 5.3.3, where a person uploads content of a kind referred to under clause 5.2.1, and the authorised user and SMC is reasonably satisfied that the breach is of a severity and that the third party is likely to further engage on the social media platform, that third party may be banned with no notification. In such situations, screenshots of the offending content should be taken and kept on Council's corporate record keeping system along with a comment from the authorised user as to the reasons for the ban and approval from the SMC.
- 5.3.5 A third party may request a review of a decision to ban them from a social media platform. The request must be made in writing to the General Manager or SMC and state the grounds on which the request is being made.
- 5.3.6 Where a review request is made under clause 5.3.5, the review is to be undertaken by the General Manager or a member of staff nominated by the General Manager who is suitably qualified and who was not involved in the decision to ban the third party.
- 5.3.7 Where a third party that is the subject of ban continues to engage on a social media platform(s) using an alternative social media account, profile, avatar, etc., an authorised user may ban the third party from the platform(s) immediately.

5.4. Turning off commenting

- 5.4.1 At the discretion of the SMC, content may be posted without permitting public comments or comments may be turned off existing posts if it is considered that commentary is causing severe and negative community impacts and not achieving the objectives of this policy.

6. Use of social media during emergencies

- 6.1 During emergencies, such as natural disasters or public health incidents, the Communications Department will be primarily responsible for the management of content on the Council's social media platforms.
- 6.2 To ensure consistent messaging both during and after an emergency, authorised users and Council officials must not upload content onto the Council's or their own social media platforms which contradicts advice issued by the agency coordinating the emergency response, or agencies supporting recovery efforts.
- 6.3 Training on social media use during emergencies should be included in training and/or induction provided to authorised users and Councillors

7. Records and privacy requirements

7.1. Records management

- 7.1.1 Social media content created, sent and received by Council officials (including Councillors) acting in their official capacity is a Council record and may constitute open access information or be subject to an information access application made under the *Government Information (Public Access) Act 2009*. These records must be managed in accordance with the requirements of the *State Records Act 1998* and the Council's approved records management policies and practices.
- 7.1.2 When/if a Councillor's term of office concludes, the Councillor must contact the General Manager or SMC to manage/transfer records of social media content created during their term of office and comply with the requirements of the *State Records Act 1998*.
- 7.1.3 In fulfilling their obligations under clauses 7.1.1 to 7.1.2, Council officials should refer to any guidance issued by the State Archives and Records Authority of NSW relating to retention requirements for councils' and councillors' social media content¹.

7.2. Privacy considerations and requirements

- 7.2.1 Social media communications are in the public domain. Council officials should exercise caution about what personal information, if any, they upload onto social media.
- 7.2.2 The *Privacy and Personal Information Protection Act 1998* applies to the use of social media platforms by the Council and Councillors. To mitigate potential privacy risks, Council officials will:
 - a) advise people to avoid providing personal information on public social media platforms

¹ See State Archives and Records Authority of NSW '*Government Recordkeeping / Advice and Resources / Local Government*' and '*Social media recordkeeping for councillors*'

- b) inform people if any personal information they may provide on social media platforms is to be used for official purposes
- c) moderate comments to ensure they do not contain any personal information such as addresses or phone numbers
- d) advise people to contact the Council or Councillors through alternative channels if they have personal information they do not want to disclose in a public forum.

7.2.3 Council officials must ensure they comply with the *Health Records and Information Privacy Act 2002* when engaging on and/or moderating social media platforms. In fulfilling their obligations, council officials should refer to any guidance issued by the Information and Privacy Commission of NSW, such as, but not limited to, the Health Privacy Principles.

8. Private use of social media

Note: Activities on social media websites are public activities. Even though privacy settings are available, content can still be shared and accessed beyond the intended recipients.

8.1. What constitutes 'private' use?

- 8.1.1 For the purposes of this policy, a Council official's social media engagement will be considered 'private use' when the content they upload:
 - a) is not associated with, or refers to, the Council, any other Council officials, contractors, related entities or any other person or organisation providing services to or on behalf of the Council, and
 - b) is not related to or does not contain information acquired by virtue of their employment or role as a Council official.
- 8.1.2 If a Council official chooses to identify themselves as a Council official, either directly or indirectly (such as in their user profile), then they will not be deemed to be acting in their private capacity for the purposes of this policy.
- 8.1.3 Staff should be aware that even content posted in a private capacity without direct reference to Council can, in some instances become work-related, if for example, other Council officials see the content by virtue of being 'friends' on the social media platform or through some other connection.

8.2. Use of social media during work hours

- 8.2.1 Council staff and officials may access and engage on social media in their private capacity during work hours provided that use is brief, intermittent and does not impact on them performing their duties.
- 8.2.2 Council staff and officials must also comply with Council's Code of Conduct which outlines guidelines for the use of Council resources.

9. Concerns or complaints

- 9.1 Concerns or complaints about the administration of a council's social media platforms should be made to the Council's SMC in the first instance.
- 9.2 Complaints about the conduct of council officials (including Councillors) on social media platforms may be directed to the General Manager.
- 9.3 Complaints about a General Manager's conduct on social media platforms may be directed to the Mayor.

10. Definitions

In this Social Media Policy, the following terms have the following meanings:

authorised user	members of Council staff who are authorised by the General Manager or SMC to upload content and engage on the Council's social media platforms on the Council's behalf
council official	Councillors, members of staff and delegates of the Council (including members of committees that are delegates of the Council)
personal information	information or an opinion (including information or an opinion forming part of a database and whether or not recorded in a material form) about an individual whose identity is apparent or can reasonably be ascertained from the information or opinion
SMC	is a Council's social media coordinator appointed under clause 2.3 of this policy
social media	online platforms and applications - such as but not limited to social networking sites, wikis, blogs, microblogs, video and audio sharing sites, and message boards - that allow people to easily publish, share and discuss content. Examples of social media platforms include, but are not limited to Facebook, Twitter, Snapchat, LinkedIn, Yammer, YouTube, Instagram, Flickr and Wikipedia

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